

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA, *ex rel.*)
DR. JOHN COOPER,)
Plaintiff,)
v.) Case No.: AMD 02 CV 3987
THE JOHNS HOPKINS HOSPITAL)
AND HEALTH SYSTEM, *et al.*,)
Defendants.)

)

**PLAINTIFF'S CONSENT MOTION FOR EXTENSION OF TIME TO
FILE OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

Comes Now the Plaintiff, by and through counsel, and files this consent motion for extension of time to file opposition to Defendants' motion to dismiss and in support thereof states as follows.

On February 28, 2005, Defendants filed a Motion to Dismiss. The Plaintiff's response is due March 17, 2005. Due to Plaintiff counsel's trial schedule, which includes a trial scheduled in the District of Columbia Superior Court the week of March 7, 2005; a response to a dispositive motion before the U.S. District Court for the District of Maryland on March 18, 2005; an administrative hearing scheduled the week March 21, 2005, before the EEOC in Washington, D.C.; and a brief before the U.S. Fourth Circuit Court of Appeals the week of March 28, 2005. Plaintiff requests a two-week extension of time to file his opposition. Plaintiff's counsel contacted Defendants' counsel to advise of this request and Defendants consented to the request.

Wherefore the Plaintiff requests that the court grant the Plaintiff up to and including March 31, 2005, to file his opposition.

Respectfully submitted,

/s/
David A. Branch
Law Offices of David A. Branch, P.C.
1825 Connecticut Avenue, N.W.
Suite 690
Washington, D.C. 20009
(202) 785-2805

Certificate of Service

I hereby certify this 16th day of March 2005, a copy of the foregoing Plaintiff's Consent Motion for Extension of Time to File Opposition to Defendants' Motion to Dismiss was sent to counsel for Defendants, Stephen J. Immelt and Therese M. Goldsmith, Hogan & Hartson L.L.P., 111 S. Calvert Street, Suite 1600, Baltimore, MD 21202.

/s/
David A. Branch